

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**OLLIE GREENE, Individually as the
surviving parent of WYNDELL GREENE,
SR., WILLIAM GREENE, as the
Administrator of the Estate of WYNDELL
GREENE, SR., and MARILYN BURDETTE
HARDEMAN, Individually and as the
surviving parent of LAKEYSHA GREENE,**

CAUSE NUMBER: 3:11-cv-0207-N

Plaintiffs,

V.

TOYOTA MOTOR CORPORATION,
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH AMERICA,
INC., TOYOTA MOTOR SALES USA,
INC., VOLVO GROUP NORTH
AMERICA, LLC., VOLVO TRUCKS
NORTH AMERICA, A DIVISION OF
VOLVO GROUP NORTH AMERICA,
LLC., STRICK TRAILERS, LLC, JOHN
FAYARD MOVING & WAREHOUSE,
LLC, and DOLPHIN LINE, INC.

JURY TRIAL DEMANDED

Defendants.

PRESIDING JUDGE Hon. David Godbey	PLAINTIFF'S ATTORNEYS Aubrey "Nick" Pittman and Daryl K. Washington	DEFENDANTS' ATTORNEYS:
TRIAL DATE(S):	COURTROOM CLERK:	COURT REPORTER:

PLAINTIFFS' EXHIBIT LIST

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
1.	Photo of Lakeysha Greene laying in the roadway				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
2.	Photo of Toyota SUV burning at accident site				
3.	Kaufman County Records Affidavit of 9-1-1 calls				
4.	Photo of Greene child charred remains				
5.	Photo2 of Greene child charred remains				
6.	Photo of wreckage and blood on roadway				
7.	Photo of charred remains being removed from Toyota 4Runner				
8.	Photo of rear of Toyota 4Runner at accident site				
9.	Photo of side of Toyota 4Runner at accident site				
10.	Photo of rear of Dolphin-Strick trailer at accident site				
11.	Photo of ICC Rear Impact Guard laying in roadway				
12.	Photo2 of ICC Rear Impact Guard laying in roadway				
13.	Intentionally Omitted				
14.	Photo of mud-flap on Dolphin Trailer at accident site				
15.	Close-up of photo2 of mud-flap on Dolphin Trailer at accident site				
16.	Photo of the Volvo tractor's front grill at accident site				
17.	Photo of front of Volvo truck at accident site				
18.	Intentionally Omitted				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
19.	Intentionally Omitted				
20.	Intentionally Omitted				
21.	Invoice for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.				
22.	Quotation for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.				
23.	Photo of rear of Strick Trailer after repair by Gulf City Body and Trailer Works, Inc.				
24.	Intentionally Omitted				
25.	Intentionally Omitted				
26.	Accident Report dated June 1, 2010, from Daniel Sprinkle of May 28, 2010, accident				
27.	Photos of rear of Strick trailer after accident - taken by John Fayard Moving				
28.	Fayard's Net Worth [CONFIDENTIAL]				
29.	April 6, 2010 Dolphin Repair Order				
30.	List of Trailers owned by Dolphin				
31.	Exemplar of Dolphin Broker Carrier Agreement, such as the one with Fayard Moving and Warehouse				
32.	Delivery receipt from RC Trailers for delivery of Strick Trailers to Dolphin				
33.	Financial statements of Dolphin Line Inc. [CONFIDENTIAL]				
34.	July 10, 2007 Dolphin Repair Order				
35.	February 29, 2008 Dolphin Repair Order				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
36.	July 2, 2008 Dolphin Repair Order				
37.	April 6, 2010 Dolphin Repair Order				
38.	Intentionally Omitted				
39.	Email from Todd Parks with deposition subjects for Strick designees and notification of production of exemplar trailer				
40.	Strick Invoice dated February 10, 2003 with RC Trailers				
41.	Strick Invoice with RC Trailers, signed by all				
42.	Strick Sales Order Specifications for RC Trailers Order				
43.	Press Release from Insurance Institute for Highway Safety – <i>Underride guards on big rigs fail in crashes; Institute petitions government for new standard</i>				
44.	Letter to NHTSA from Insurance Institute for Highway Safety re: petitioning the government for new standard for underride guards				
45.	<i>Underride Crashes: Status Report</i> from Insurance Institute for Highway Safety				
46.	April 14, 1993, memo from NHTSA regarding Rear Impact guards				
47.	Email among Strick officers regarding the Torcominian Patent's Underride Guard				
48.	Strick Trailer Care and Maintenance Manual				
49.	Strick Trailer Care and Maintenance Manual - Updated Dec 2011				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
50.	Strick's Manufacturer's Certification Label				
51.	Strick flyer – acknowledging that aftermarket and parts distributor is New Life Transport Parts Center				
52.	Strick's Dealers Names and Locations				
53.	Strick's Parts Nomenclature from New Life Transport Center				
54.	ICC Complete Assembly Orders				
55.	Strick Letter dated June 19, 1998 to customers to retrofit guards to new standards				
56.	Cost Bill of Materials for Rear of Strick Trailer				
57.	Photo1 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards				
58.	Photo2 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards				
59.	Photo3 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards				
60.	Strick diagram showing an ICC guard with rounded end				
61.	Canadian Motor Vehicle 223 Standards effective 2005				
62.	List of Underride cases in which Strick has been involved				
63.	Strick Record Retention Policy				
64.	April 6, 2012 Supplemental Discovery Request to Strick				
65.	Strick Balance Sheet [CONFIDENTIAL]				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
66.	Canadian Motor Vehicle 223 Test Methods dated 2003				
67.	Strick 1995 Rear Impact Guard Testing Report				
68.	Karco Testing Report for Strick Trailers submitted to NHTSA 1999				
69.	Texas Peace Officer's Report prepared by Trooper Barkley				
70.	Excerpt from Texas Peace Officer's Report prepared by Trooper Clint Baughman				
71.	Excerpt2 from Texas Peace Officer's Report prepared by Trooper Clint Baughman				
72.	Annual Vehicle Inspection Report for Dolphin Tractor				
73.	Crash Investigation Report from Texas Peace Officer's Report prepared by Trooper Clint Baughman regarding John Fayard Moving & Storage				
74.	Supplemental Investigation report with information obtained from Trooper Barclay				
75.	Intentionally Omitted				
76.	Intentionally Omitted				
77.	Volvo's document retention policy				
78.	IIHS Status Report dated April 17, 2008 re: Crash Avoidance Technologies				
79.	May 10, 2000 Cooperative Agreement between Volvo and U.S. Dep't of Transportation re 3 year 100 vehicles Intelligent Vehicle Initiative Field Operational Test				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
80.	Preliminary Studies in Haptic Displays for Rear-End Collision Avoidance System et al				
81.	Volvo Trucks Field Operational Test - Evaluation of Advanced Safety Systems for Heavy Trucks, prepared by Volvo, DOT, and others				
82.	National Transportation Safety Board Special Investigative Report - Prevention of Rear end collisions				
83.	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies				
84.	National Transportation Safety Board's investigation of Truck-Tractor Semitrailer Rear-end Collision into Passenger Vehicles on Interstate 44 Near Miami, Oklahoma June 26, 2009				
85.	Diagram of various Volvo Entities				
86.	Volvo Safety Milestones from Volvo Website				
87.	Volvo Truck Build Record for Volvo Truck involved in Greene crash				
88.	Diagram of Collision Warning Detection Technology and Effective Distances				
89.	Vorad Collision Warning System Service Manual				
90.	Eaton Vorad Installation Guide				
91.	Volvo 3P Purchasing				
92.	Press Release - Volvo Trucks introduces Collision Warning with Emergency Brake				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
93.	NHTSA's Vehicle Compatibility Research Program				
94.	Diagram of Volvo testing setup (offset wall)				
95.	Volvo truck prepared for testing setup				
96.	Photo of Volvo truck ready for testing (front view)				
97.	Photo of Volvo truck ready for testing approaching wall (side view)				
98.	Photo of Volvo truck during crash testing (overhead view)				
99.	Photo of Volvo truck during crash testing (driver's side view)				
100.	Photo2 of Volvo truck during crash testing (driver's side view)				
101.	Drawing of Volvo Model VNL Truck Hood				
102.	Diagram of engineering drawing of hood of Volvo truck				
103.	Brochure of Volvo VN 630 Specifications, Options and Engines				
104.	Invoice for Volvo Truck involved in collision listing specifications and options				
105.	Photo of Volvo truck at accident site (passenger side view)				
106.	Photo of Volvo truck at accident site (front end view)				
107.	Photo of Volvo truck at accident site (showing front end and grill)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
108.	Press Release in 2003 re Volvo Trucks in the Forefront Protecting Cars in Truck Accidents (discussing FUPS)				
109.	Content on Volvo Website regarding use of Front Under-run Protection System (FUPS) in United Arab Emirates				
110.	Content on Volvo Website regarding use of Front Under-run Protection System (FUPS) in Great Britain and Ireland				
111.	Content on Volvo Website regarding use of Front Under-run Protection System (FUPS) in Australia				
112.	Photo of remaining parts of Volvo tractor bumper taken at inspection				
113.	Volvo's listing of finite element modeling projects from Volvo's counsel				
114.	Chassis layout diagram for Volvo Truck				
115.	Volvo Information Bulletin of different VN model truck in the United States				
116.	VORAD 400 Owner's manual				
117.	Article - <i>First Order Analysis for Automotive Body Structure Design</i>				
118.	Article - <i>Application of Crash Simulation to Vehicle Development</i>				
119.	Passive Safety - Toyota's use of CAE and FEM				
120.	Document Retention Policy for Toyota Motor Corporation				
121.	<i>The Study of the Frontal Compatibility of Consideration of Interaction and Stiffness</i>				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
122.	THUMS Total HUman Model for Safety article				
123.	THUMS Total HUman Model for Safety 2011 article				
124.	Simulation of Occupant Motion in Rear Impacts using Human FE Model THUMS				
125.	Intentionally Omitted				
126.	Intentionally Omitted				
127.	Photograph of undercarriage of 2010 Toyota 4Runner prepared for NCAP testing				
128.	Photo of undercarriage of Toyota 4Runner Trail model (from Toyota Brochure)				
129.	Narrative of Fuel System from Toyota 4Runner Brochure				
130.	Narrative and diagram of Fuel Tank components (from Toyota 4Runner Brochure)				
131.	Letter dated March 5, 1993 from Saburo Inui to NHTSA discussing FMVSS 301 and standards for testing tanks				
132.	Narrative and diagram of SRS airbags (from 2010 Toyota Brochure)				
133.	Toyota press release of recall of RAV4 and Highlander vehicles to replace curtain shield airbag sensor assembly				
134.	Toyota press release of recall of 2011 RAV4 vehicles to replace curtain shield airbag initiator assembly				
135.	Picture showing the burning Toyota 4Runner				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
136.	Intentionally Omitted				
137.	Toyota Motor Sales' Document Retention Policy				
138.	Toyota 4Runner Ad (<i>No Intelligent Life Out There</i>)				
139.	Toyota 4Runner ad (<i>Rise Above Ordinary</i>)				
140.	Website advertising of Toyota 4Runner				
141.	September 24, 2009, Press Release announcing launch of 2010 4Runner				
142.	Internet article of Press Release regarding debut of Toyota 4Runner in Dallas				
143.	Sales brochure for 2011 4Runner				
144.	Sales brochure for 2010 4Runner				
145.	Toyota Pocket Source Brochure for 2010 4Runner				
146.	Intentionally Omitted				
147.	Copy of Toyota advertisement (spending a million dollars per hour)				
148.	Toyota 4Runner ad (Star Safety)				
149.	Toyota 2010 Organizational Chart				
150.	Toyota Press Release of recall of selected Lexus models				
151.	Toyota Press Release of recall of 4Runners and other vehicle in Southeast Region for Seat Occupant Sensing System				
152.	Toyota Press Release of recall of certain vehicles for passenger airbag inflator problems				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
153.	Manufacturers Motor Vehicle Specifications for 2010 4Runner				
154.	Toyota 4Runner Owners Warranty Rights Notification				
155.	Main Vehicle Inquiry showing logistics and building of the Greene 4Runner				
156.	Service Serial Master Inquiry for Greene 4Runner				
157.	Texas Dept. of Motor Vehicle history for the Greene 4Runner				
158.	Monroney Label (Sticker Label) for Greene 4Runner				
159.	Toyota Organizational Chart for 2013				
160.	Mills Accident Report				
161.	Diab Accident Report				
162.	Baker Accident Report				
163.	Puga Accident Report				
164.	Schiller Accident Report				
165.	Snelgrove Accident Report				
166.	Photo of accident site (Exhibit 1 from Brian Thompson Deposition)				
167.	Recall letter from NHTSA dated June 25, 2010 of 2010 Lexus HS for noncompliance with FMVSS 301				
168.	Toyota's July 27, 2010 letter to NHTSA responding to recall notice re 2010 Lexus HS for noncompliance with FMVSS 301				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
169.	Scale diagram of accident scene received from Texas Highway Patrol Division				
170.	Information regarding Stop-Sale Order on Toyota Automobiles from U.S., Canada over Flammable Seat Fabric				
171.	Intentionally Omitted				
172.	Intentionally Omitted				
173.	Intentionally Omitted				
174.	NHTSA Publication - Traffic Safety Facts 2006 Data (bates no. GREENE_006711-15)				
175.	Toyota Press Release confirming more than 2.2 million vehicles sold in U.S. in 2008.				
176.	Announcement: Toyota Launches New Product Leadership Campaign with its agency Saatchi & Saatchi.				
177.	Ad with mom holding a baby - No matter who you are or what you drive, everyone deserves to be safe				
178.	Ad from front page of Yahoo, shown nationwide, depicting a woman holding a baby and figures of a family of four and the slogan "Everyone deserves safety."				
179.	Ad depicting minorities standing behind Toyota's "everyone deserves to be safe" claim.				
180.	National ad portraying actor (or employee) who is represented to be a female Automotive Engineer with Toyota.				
181.	National ad portraying actor (or employee) who is represented to be a minority male Automotive Engineer at Toyota.				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
182.	National ad portraying actor (or employee) who is represented to be the Chief Engineer at Toyota.				
183.	National ad alleging that Toyota has set up “Smart Teams,” comprising “200 highly trained engineers and technical experts.				
184.	National ad alleging that Toyota has set up “Smart Teams,” includes an endorsement from Toyota’s “Chief Quality Officer,”				
185.	Toyota T.V. ad depicting a couple, and announcing that Toyota is recognized for being safe.				
186.	Toyota T.V. ad depicting small children, and announcing that Toyota is recognized for being safe.				
187.	Toyota T.V. ad depicting a family of four, and announcing that Toyota is recognized for being safe.				
188.	Toyota T.V. ad depicting an African-American family with kids, and announcing that Toyota is recognized for being safe.				
189.	Toyota T.V. ad with a tagline announcing that Toyota is recognized for being safe.				
190.	Toyota T.V. ad with a tagline announcing that “no other brand has won more (safety awards).”				
191.	National ad - spending \$1 million an hour on safety is displayed prominently on the commercial.				
192.	Rollover Ratings for Midsize SUV’s prepared by Insurance Institute for Highway Safety, Highway Loss Data Institute.				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
193.	February 24, 2010, testimony of Toyota's CEO, Akio Toyoda, before the U.S. House Committee on Oversight and Government Reform.				
194.	February 9, 2010 Op-Ed in the Washington Post written by Toyota's CEO, Akio Toyoda.				
195.	Press Release: Toyota paid \$1.6 billion to settle claims related to certain recalls.				
196.	Press release: Toyota paid a record \$16.4 million fine to the U.S. government for failing to quickly report safety problems.				
197.	Toyota recall in 2010 of thousands of the 2010 Lexus HS 250h due to deadly fuel leaks after collisions				
198.	Toyota recall of the Lexus GS, IS 250 and IS 350 models in the United States due to potential cracks in fuel pipes.				
199.	Toyota recall of 2009-2012 4Runners, Sequoias, and other vehicles because Toyota failed to test the passenger seat occupant sensing system calibration.				
200.	Toyota recall of hundreds of thousands of RAV4 and Highlander SUVs due to defective curtain shield airbags.				
201.	Toyota recall of more RAV4 and Highlander SUV models for defective side curtain shield airbags.				
202.	Toyota recalls Corolla, Sequoia, Tundra vehicles for defective airbag inflators.				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
203.	Toyota press releases confirming that Toyota has had over thirty-five (35) recalls over the last 2-3 years on all of its models for various safety issues.				
204.	Toyota ad depicting that the 4Runner is used off-road.				
205.	Toyota ad depicting the 4Runner being used for racing.				
206.	Toyota ad - 4Runner has maximum ground clearance.				
207.	Toyota ad of the undercarriage of 2010 Toyota 4Runner 4x4 version - bates SSTSUB13-00166				
208.	Toyota ad stating that the 4Runner can “take on any road to anywhere.”				
209.	Toyota advertised the 4Runner as “one of the most trustworthy vehicles on the road.”				
210.	2010 article noting that Toyota’s safety campaign was being blitzed all over the country on virtually every network.				
211.	Advertisement for Toyota 4Runner - “take daily nonstop to the middle of nowhere...then return home to tell us about it thanks to the Star Safety System.”				
212.	Official Justice Department Press Release Announcing Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
213.	Official Justice Department Deferred Prosecution Agreement regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty				
214.	Official Justice Department Statement of Facts regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty				
215.	Toyota Automotive Safety Manual – Bates number 86845-86892				
216.	Slideshow presentation (first 10 pages) – http://www.sc.toyotafinancial.com/web/tfs/pub/contents/investorRelations/Investor%20Presentation%20April%202013.pdf				
217.	Letter dated June 14, 2010 from Toyota Financial Services regarding amount to be paid to Toyota as a result of the loss of the 4Runner				
218.	Toyota's Annual Report (Form 20-F) for 2010, pursuant to Section 13 of the SEC Act of 1934 (bates-numbers 847962-848163)				
219.	Volvo ad - Taking truck safety seriously				
220.	Volvo ad - At the forefront of traffic safety				
221.	Volvo ad – Safety is Paramount				
222.	Volvo drivers participate in major safety study				
223.	Volvo Manual – <i>Nobody Builds Safer Trucks</i>				
224.	Volvo Brochure - <i>world's leader in collision avoidance</i>				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
225.	NHTSA letter dated July 5, 2013 regarding Volvo recall campaign for 2007 VN truck for braking defect				
226.	Volvo's official owner notification of the recall of the 2007 VN truck for braking defect				
227.	List of NHTSA's 38 recalls of the Volvo VNL Truck due to hazards with various components				
228.	Volvo to pay \$1.6 million fine to the government for delayed reporting of recalls				
229.	NHTSA's 2012 Vehicle Recalls by Manufacturer				
230.	Website printout of Volvo's use of front underride protection on Volvo trucks in Europe				
231.	Volvo ad - Safety is not an option. It is the standard				
232.	"FUPS for Conventional Truck"- VGNA_007513				
233.	Volvo Executive Summary Report of results with Vorad on 100 trucks for 36 million miles 2001-2004				
234.	Federal Motor Carrier Safety Administration article showing available collision warning systems				
235.	Cooperative agreement dated May 10, 2000, between Volvo Trucks and U.S. Dept. of Transportation regarding Intelligent Vehicle Initiative [Cheek Depo Ex. 7]				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
236.	Volvo Trucks Field Operational Test: Evaluation of Advanced Safety Systems for Heavy Trucks, Bates VGNA_000815-825. [Cheek Depo Ex. 8]				
237.	U.S. Department of Transportation Federal Motor Carrier Safety Administration description of Collision Mitigation Systems [Cheek Depo Ex. 12]				
238.	Installation guide for Eaton VORAD, VOIG-0035, April 23 2005, Bates GREENE_006507-536. [Cheek Depo Ex. 13]				
239.	Accident Analysis and Prevention journal article, Crash avoidance potential of four large truck technologies, Bates VGNA 006612-6620. [Cheek Depo Ex. 14]				
240.	Highway Loss Data Institute Bulletin April 2012, Volvo collision avoidance features, initial results. [Cheek Depo Ex. 15]				
241.	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies. [Cheek Depo Ex. 16]				
242.	Website showing location of Volvo Trucks				
243.	Volvo's statement of Net Worth [CONFIDENTIAL]				
244.	Photo of rear of Dolphin-Strick trailer - GREENE_002101				
245.	Photo of underside of Dolphin-Strick trailer - GREENE_002238				
246.	Information from Strick's membership group and NHTSA regarding potential costs and benefits of underride guards				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
247.	Strick Trailer's February 2, 1998 Testing Report for "16" Weld-on Bumper Gusset"				
248.	Department of Public Safety Photos (bates no. Toyota 00007-00080)				
249.	WFAA News scene photograph (bates no. Toyota_00131)				
250.	Autopsy of Lakeysha Greene				
251.	Autopsy of Wyndell Greene, Sr.				
252.	Recording of Kaufman County 9-1-1 call: 025_2010_05_28_182454699 (confirmed by Plaintiffs' Ex. 3)				
253.	Recording of Kaufman County 9-1-1 call: 022_2010_05_28_182454261 (confirmed by Plaintiffs' Ex. 3)				
254.	Recording of Kaufman County 9-1-1 call: 005_2010_05_28_183041417 (confirmed by Plaintiffs' Ex. 3)				
255.	Recording of Kaufman County 9-1-1 call DISPATCHING Elmo Fire and Rescue: 023_2010_05_28_182733167 (confirmed by Plaintiffs' Ex. 3)				
256.	Affidavit of Texas Department of Transportation Crash Report				
257.	Affidavit of Billing of Reasonable and Necessary Medical Expenses from UT Southwestern Medical Center (bates no. GREENE_006442-006467)				
258.	Medical Examiner's tagged photographs of Wyndell Greene, Sr. (with private parts redacted) (bates no. GREENE_006468-006470)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
259.	Medical Expenses from Air Evac Lifeteam to transport Wyndell Greene, Sr. on May 28, 2010				
260.	Affidavit of medical records from Air Evac Lifeteam for Wyndell Greene, Sr. on May 28, 2010 (bates no. GREENE_000125-000137)				
261.	Medical Expenses from Centennial Medical Center				
262.	Photos at accident site (bates no. GREENE_000400-000407)				
263.	Dairy entries in Caring Bridge journal (bates no. GREENE_000432-000453)				
264.	Affidavit of Billing of Reasonable and Necessary Medical Expenses from Parkland Hospital (bates no. GREENE_002820-003115)				
265.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 1 of 8)				
266.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 2 of 8)				
267.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 3 of 8)				
268.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 4 of 8)				
269.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 5 of 8)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
270.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 6 of 8)				
271.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 7 of 8)				
272.	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 8 of 8)				
273.	Summary of Wyndell Greene medical expenses paid by Meridian Resource on behalf of Lakeysha Greene				
274.	ETMC EMS Patient Care Records for Wyndell Greene on May 28, 2010				
275.	Dairy entries in Caring Bridge journal (bates no. GREENE_002494-002726)				
276.	Lakeysha and Wyndell Greene wedding photo				
277.	Photo of Wesleigh Greene at birth				
278.	Photo of Wesleigh Greene with her father as he works				
279.	Photo of Wesleigh Greene at 1 st birthday party				
280.	Photo of Wyndell Greene, Sr. teaching Wesleigh to swim				
281.	Wesleigh Greene's writings and drawings to her mother				
282.	Wesleigh Greene's writings and drawings to her mother and father				
283.	Wyndell Greene, Sr. and Wesleigh Greene at Daughter-Daddy dance				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
284.	Photo of Wesleigh Greene dressed for birthday party				
285.	Photo of Wyndell Greene, II at childbirth				
286.	Photo of Wyndell "Kyle" Greene, II				
287.	Photo of Wesleigh Greene				
288.	Photo of Wesleigh and Kyle Greene				
289.	Short video of Wesleigh Greene				
290.	Short video of Wyndell Kyle Greene, II				
291.	Greene Family Photo				
292.	Photo of Wesleigh Greene and teacher				
293.	Wesleigh Greene and classmates				
294.	Greene Family Photo				
295.	Greene Family Photo				
296.	Photo of Mrs. Marilyn Hardeman and grandkids				
297.	Photo of Mrs. Ollie Greene and Wesleigh				
298.	Memorial Service video for Lakeysha, Wesleigh, and Wyndell Greene, II (bates no. GREENE_006435)				
299.	Printed Memorial Service Program for Lakeysha, Wesleigh, and Wyndell Greene, II				
300.	Video portrait of the Greene family (bates no. GREENE_006716)				
301.	Video of balloon send-off for Wesleigh Greene from classmates (bates no. GREENE_000455)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
302.	Funeral expenses for Lakeysha, Wesleigh, and Kyle funeral				
303.	Photo of gravestone for Lakeysha, Kyle and Wesleigh Greene				
304.	Wyndell Greene's funeral program				
305.	Video 1 of interior and exterior of the Greene residence				
306.	Video 2 of interior and exterior of the Greene residence				
307.	Timeline of critical dates				
308.	Dr. Darrell Henderson's Expert Report				
309.	Curriculum Vitae and testimony list for Dr. Darrell Henderson				
310.	Photo1 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
311.	Photo2 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
312.	Photo3 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
313.	Photo4 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
314.	Photo5 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
315.	Photo6 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
316.	Photo7 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
317.	Photo8 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
318.	Photo9 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)				
319.	Skin and Burn Illustrations_0001				
320.	Skin and Burn Illustrations_0002				
321.	Skin and Burn Illustrations_0003				
322.	Skin and Burn Illustrations_0004				
323.	Intentionally Omitted				
324.	Intentionally Omitted				
325.	Expert report of Dr. Trudi Zaplac				
326.	Curriculum Vitae of Dr. Trudi Zaplac				
327.	Expert report of Dr. Stan Smith				
328.	Curriculum Vitae of Dr. Stan Smith and list of cases				
329.	Wyndell and Lakeysha Greene Tax Returns 2005-2010				
330.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 1 OF 2				
331.	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 2 OF 2				
332.	Wyndell Greene payroll records - Merrill Lynch				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
333.	Lakeysha Greene payroll records – Accenture, Vol 1 of 3				
334.	Lakeysha Greene payroll records – Accenture, Vol 2 of 3				
335.	Lakeysha Greene payroll records – Accenture, Vol 3 of 3				
336.	Lakeysha Greene payroll records - PepsiCo				
337.	Expert report of Jeff Vick				
338.	Curriculum Vitae of Jeff Vick				
339.	On-Site Photo DSC07094				
340.	On-Site Photo DSC07096				
341.	On-Site Photos DSC07102 and DSC07123				
342.	On-Site Photos DSC07104 and DSC07128				
343.	On-Site Photo DSC07105 and DSC07129				
344.	On-Site Photo DSC07106 and DSC 07130				
345.	On-Site Photo DSC07107 and DSC07136				
346.	On-Site Photo DSC07111				
347.	On-Site Photo DSC07114				
348.	On-Site Photo DSC07116				
349.	On-Site Photo DSC07118				
350.	On-Site Photo DSC07122				
351.	On-Site Aerial Photo MG_6717_4000				
352.	On-Site Photo of accident fire				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
353.	On-Site Photo1 of vehicles at rest				
354.	On-Site Photo2 of vehicles at rest				
355.	On-Site Photo3 of vehicles at rest				
356.	On-Site Photo4 of vehicles at rest				
357.	On-Site Photo5 of vehicles at rest				
358.	On-Site Photo6 of vehicles at rest				
359.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01038				
360.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01039				
361.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01042				
362.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01043				
363.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01045				
364.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01046				
365.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01047				
366.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01051				
367.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01053				
368.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01055				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
369.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01056				
370.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01057				
371.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01059				
372.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01060				
373.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01063				
374.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01064				
375.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01065				
376.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01068				
377.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01069				
378.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01070				
379.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01072				
380.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01073				
381.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01074				
382.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01075				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
383.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01076				
384.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01077				
385.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01083				
386.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01084				
387.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01099				
388.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01101				
389.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01102				
390.	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01103				
391.	Toyota 4Runner Photo DSC06488				
392.	Toyota 4Runner Photo DSC06489				
393.	Toyota 4Runner Photo DSC07419				
394.	Toyota 4Runner Photo DSC07420				
395.	Toyota 4Runner Photo DSC07421				
396.	Toyota 4Runner Photo DSC07422				
397.	Toyota 4Runner Photo DSC07423				
398.	Toyota 4Runner Photo DSC07424				
399.	Toyota 4Runner Photo DSC07426				
400.	Toyota 4Runner Photo DSC07427				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
401.	Toyota 4Runner Photo DSC07428				
402.	Toyota 4Runner Photo DSC07434				
403.	Toyota 4Runner Photo DSC07435				
404.	Toyota 4Runner Photo DSC07436				
405.	Toyota 4Runner Photo DSC07437				
406.	Toyota 4Runner Photo DSC07438				
407.	Toyota 4Runner Photo DSC07456				
408.	Toyota 4Runner Photo DSC07457				
409.	Toyota Corolla Photo DSC07468				
410.	Toyota 4Runner Photo DSC07470				
411.	Toyota 4Runner Photo DSC07634				
412.	Toyota Corolla Photo DSC07550				
413.	Toyota Corolla Photo DSC07551				
414.	Toyota Corolla Photo DSC07552				
415.	Toyota Corolla Photo DSC07553				
416.	Toyota Corolla Photo DSC07554				
417.	Toyota Corolla Photo DSC07562				
418.	Toyota Corolla Photo DSC07568				
419.	Toyota Corolla Photo DSC07583				
420.	Toyota Corolla Photo DSC07586				
421.	Toyota Corolla Photo DSC07595				
422.	Toyota Corolla Photo DSC07597				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
423.	Toyota Corolla Photo DSC07604				
424.	Toyota Corolla Photo DSC07611				
425.	Toyota Corolla Photo DSC07655				
426.	Toyota Corolla Photo DSC07656				
427.	Toyota Corolla Photo DSC07662				
428.	Toyota Corolla Photo DSC07663				
429.	Volvo VN Tractor Photo DSC07261				
430.	Volvo VN Tractor Photo DSC07263				
431.	Volvo VN Tractor Photo DSC07264				
432.	Volvo VN Tractor Photo DSC07266				
433.	Volvo VN Tractor Photo DSC07357				
434.	Volvo VN Tractor Photo DSC07358				
435.	Volvo VN Tractor Photo DSC07360				
436.	Volvo VN Tractor Photo DSC07381				
437.	Two photos of Volvo VN tractor at tow yard (bates no. GREENE_006505-06)				
438.	Photo of Fayard Freightliner tractor (bates no. GREENE_001123)				
439.	Photo of Fayard Freightliner tractor (bates no. GREENE_001124)				
440.	Photo of Fayard Freightliner tractor (bates no. GREENE_001213)				
441.	Photo of Fayard Freightliner tractor (bates no. GREENE_001224)				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
442.	Photo of Fayard Freightliner tractor (bates no. GREENE_001226)				
443.	Photo of Fayard Freightliner tractor (bates no. GREENE_001231)				
444.	Photo of Fayard Freightliner tractor (bates no. GREENE_001232)				
445.	Photo of Fayard Freightliner tractor (bates no. GREENE_001233)				
446.	Photo of Fayard Freightliner tractor (bates no. GREENE_001236)				
447.	Photo of Fayard Freightliner tractor (bates no. GREENE_001240)				
448.	Photo of Fayard Freightliner tractor (bates no. GREENE_001242)				
449.	Photo of Fayard Freightliner tractor (bates no. GREENE_001243)				
450.	Photo of Fayard Freightliner tractor (bates no. GREENE_001245)				
451.	Photo of Fayard Freightliner tractor (bates no. GREENE_001246)				
452.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001273)				
453.	Photo of inspection certification from Fayard Freightliner tractor (bates no. GREENE_001274)				
454.	VinLink VIN information for Toyota 4Runner				
455.	VinLink VIN information for Toyota Corolla				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
456.	2006 TOYOTA COROLLA 4 DOOR SEDAN AutoStats				
457.	2010 TOYOTA 4RUNNER 4 DOOR 4X2 UTILITY AutoStats				
458.	StifCalc Rear Impact Test Summary Report				
459.	StifCalc Rear Impact Test Summary Report- Utility vehicles				
460.	Equations and Calculations from Jeff Vick				
461.	Volvo Point of Perception - diagram				
462.	Volvo Braking Begins - diagram				
463.	Volvo 4 Runner Impact - diagram				
464.	4 Runner Corolla Impact - diagram				
465.	Volvo 4 Runner Corolla impact - diagram				
466.	4 Runner Volvo Separation - diagram				
467.	4 Runner Strick Trailer Impact - diagram				
468.	Strick Trailer Impact - diagram				
469.	Tool Box Impact - diagram				
470.	Vehicle Final Rest Position - diagram				
471.	Texas Dept. of Public Safety - Highway Patrol Officer Measurements				
472.	Friedman Research Expert Report - Toyota				
473.	Friedman Research Expert Report - Volvo				
474.	Friedman Research Expert Report - Strick				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
475.	Friedman Research Expert Report – Fayard and Dolphin				
476.	Curriculum Vitae of Keith Friedman				
477.	Curriculum Vitae of Dr. R. Rhodes Stephenson				
478.	Fire bibliography – marked as Exhibit 6 to Dr. Stephenson deposition				
479.	Supplemental bibliography (marked as Exhibit 7 to Dr. Stephenson’s deposition”				
480.	Additional research considered (marked as Exhibit 7 to Dr. Stephenson’s deposition)				
481.	Toyota ad directed towards consumers in Mr. Greene’s demographic				
482.	The 2010 Toyota 4Runner				
483.	Exemplar of fuel tank from 2010 Toyota 4Runner				
484.	Photo of dislodged underride guard (bates no. GREENE_000903)				
485.	Photo of dislodged underride guard (bates no. GREENE_000904)				
486.	2010 Toyota 4Runner LF Quarter Panel Comparison between Replacement and Incident Vehicle				
487.	Comparison tank crush - Photo of end of tank to end of shield				
488.	Greene Fuel tank and rear damage				
489.	photo of bottom of strap				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
490.	photo of fuel tank skid plate				
491.	photo of rear axle				
492.	photo of rear axle bracket and stabilizer link				
493.	photo of measurement of fuel tank distance				
494.	photo of vehicle damage				
495.	Greene v Toyota Roof reinforcement Photos				
496.	photo of rear of Strick trailer				
497.	photo of metal object photographed at scene embedded in tailgate of trailer				
498.	photo of Toyota Part #63104-35010				
499.	illustration of Toyota Part #63104-35010				
500.	photo of Toyota Part #63104-35010				
501.	photo of end pieces from Toyota part #63104- 35010				
502.	Strick Trailer and Toyota 4Runner impact				
503.	illustration of accident vehicle parts				
504.	illustration of accident vehicle parts				
505.	illustration of accident vehicle parts				
506.	illustration of accident vehicle parts				
507.	Photos of underride guard at accident scene				
508.	Photo of Greene vehicle at accident scene				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
509.	Photos of examples of underride mountings				
510.	Photos of example in use underride guard				
511.	Repair quote of accident trailer arranged by Fayard				
512.	Bates# Dolphin-0320 - Annual Vehicle Inspection Report for Dolphin Line Vehicle dated 5-6-2009				
513.	Photos of underride guards that Fayard installed on the Strick trailer				
514.	Violations discovered by TXPDS Commercial Vehicle Enforcement (TX10440EAQ01, CD# 0798253, 5/28/2010				
515.	Documents included with purchase of Strick authorized parts - no instructions				
516.	Photo of Strick part				
517.	Photo of Strick underride guard as received				
518.	Photo of Strick underride guard test				
519.	Underride guard P3 test results				
520.	Photo illustrations of underride guard designs that are welded to cross tube				
521.	Comparison illustrations of underride guards				
522.	Illustration of Strick tested version of underride guard had bolts on the top bracket				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
523.	Document - Strick bill of materials that proves they knew trailer was for Dolphin Line (customer)				
524.	Photos of scratch marks on incident Toyota 4Runner on pavement and partial shield				
525.	Photos of Volvo front end and flexible bumper fascia that fell off				
526.	Figure - Comparison of FMVSS Stopping Distance Requirements from 60 mph				
527.	VGNA_007565 - Load cases				
528.	From Toyota Bates 754674-754682,				
529.	From Toyota Bates 754683-754688				
530.	From Toyota Bates 754689-754697				
531.	Passive Safety - Finite Element Modeling				
532.	Toyota partial body				
533.	FE model of Toyota 4Runner				
534.	2010 vs 2014 Toyota 4Runner rear portion comparison				
535.	Photo of 2010 Toyota 4Runner fuel tank distance to rear axle				
536.	Comparison illustrations 2010 Toyota 4Runner with fuel tank				
537.	Toyota frame, tank, body deformation illustration				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
538.	2010 Toyota 4Runner fuel tank with labels and test results				
539.	Photo - side view of driver rear frame - incident 2010 Toyota 4Runner				
540.	Photo from Toyota Rav4				
541.	Alternative design of fuel tank placement				
542.	Alternative frame design and fuel tank placement				
543.	Check valve illustrations				
544.	Illustration of fuel tanks Toyota vehicles - 1994 4Runner, 2008 Rav4, 2008 Sequoia				
545.	Illustration of fuel tank - 2006 Toyota 4Runner				
546.	Test Results and comparison of 2010 Toyota 4Runner with other vehicle fuel system designs				
547.	Exhibit 12 from Keith Friedman Deposition				
548.	Illustrations of leak testing, accident scene information, and vehicle characteristics				
549.	Illustrations related to Strick underride guard				
550.	Illustrations of Toyota fuel system components				
551.	Illustrations of Toyota parts and strick trailer				
552.	Illustrations related to Strick underride guard				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
553.	illustrations of strick Toyota and volvo parts and concepts				
554.	Illustration of strick underride guard				
555.	Illustration of Toyota part and trailer				
556.	illustration of Toyota 4runners				
557.	illustration of Toyota parts				
558.	illustration of frame designs				
559.	Illustration of volvo tractor parts				
560.	Illustration of accident vehicle parts				
561.	Illustration of Toyota shield				
562.	Illustration of fuel tanks				
563.	Illustration of Toyota shield				
564.	Illustration of seat belt usage				
565.	Illustration of accident vehicle damage				
566.	Illustration of accident vehicle damage				
567.	Illustration of accident vehicle damage				
568.	Illustration of accident vehicle damage				
569.	Illustration of accident vehicle damage				
570.	Illustration of accident vehicle damage				
571.	Illustration of Toyota vehicles				
572.	Illustration of fuel tanks				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
573.	Illustration of vehicle damage and defense analyses/test				
574.	Illustration of vehicle damage				
575.	Illustration of strick underride guards				
576.	Illustration of vehicle damage, scene, parts				
577.	Illustration of Toyota parts				
578.	Illustration of Toyota parts				
579.	Illustration of Toyota parts				
580.	Illustration of Toyota parts				
581.	Illustration of Toyota parts				
582.	Illustration of Toyota parts				
583.	Illustration of Toyota parts				
584.	Illustration of Toyota parts				
585.	Illustration of Toyota parts				
586.	Demonstrative video heavy truck to suv 1				
587.	Demonstrative video heavy truck to suv 2				
588.	Demonstrative video heavy truck to suv 3				
589.	Demonstrative video heavy truck to suv 4				
590.	Demonstrative video heavy truck to suv 5				
591.	Demonstrative video heavy truck to suv 6				
592.	Demonstrative video heavy truck to suv 7				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
593.	Demonstrative video heavy truck to suv 8				
594.	Demonstrative video heavy truck to suv 9				
595.	Demonstrative video heavy truck to suv 10				
596.	Demonstrative video heavy truck to suv 11				
597.	Demonstrative video heavy truck to suv 12				
598.	Demonstrative video heavy truck to suv 13				
599.	Demonstrative video heavy truck to suv 14				
600.	Demonstrative video heavy truck to suv 15				
601.	Demonstrative video heavy truck to suv 16				
602.	Demonstrative video heavy truck to suv 17				
603.	Demonstrative video heavy truck to suv 18				
604.	Demonstrative video heavy truck to suv 19				
605.	Demonstrative video heavy truck to suv 20				
606.	Demonstrative video heavy truck to suv 21				
607.	Demonstrative video heavy truck to suv 22				
608.	Demonstrative video heavy truck to suv 23				
609.	Demonstrative video heavy truck to suv 24				
610.	Demonstrative video heavy truck to suv 25				
611.	Demonstrative video suv to trailer 1				
612.	Demonstrative video suv to trailer 2				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
613.	Demonstrative video suv to trailer 3				
614.	Demonstrative video suv to trailer 4				
615.	Demonstrative video suv to trailer 5				
616.	Demonstrative video suv to trailer 6				
617.	Demonstrative video suv to trailer 7				
618.	Demonstrative video suv to trailer 8				
619.	Demonstrative video suv to trailer 9				
620.	Demonstrative video suv to trailer 10				
621.	Demonstrative video suv to trailer 11				
622.	Demonstrative video suv to trailer 12				
623.	Demonstrative video suv to trailer 13				
624.	Demonstrative video suv to trailer 14				
625.	Demonstrative video suv to trailer 15				
626.	Demonstrative video suv to trailer 16				
627.	Demonstrative video suv to trailer 17				
628.	Demonstrative video suv to trailer 18				
629.	Demonstrative video suv to trailer 19				
630.	Demonstrative video suv to trailer 20				
631.	Demonstrative video suv to trailer 21				
632.	Demonstrative video suv to trailer 22				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
633.	Demonstrative video suv to trailer 23				
634.	Demonstrative video suv to trailer 24				
635.	Demonstrative video suv to trailer 25				
636.	Demonstrative video fuel tank leak				
637.	Demonstrative video fuel tank leak				
638.	Friedman/Stephenson Analysis of Evidence Photo 1				
639.	Friedman/Stephenson Analysis of Evidence Photo 2				
640.	Friedman/Stephenson Analysis of Evidence Photo 3				
641.	Friedman/Stephenson Analysis of Evidence Photo 4				
642.	Friedman/Stephenson Analysis of Evidence Photo 5				
643.	Friedman/Stephenson Analysis of Evidence Photo 6				
644.	Friedman/Stephenson Analysis of Evidence Photo 7				
645.	Friedman/Stephenson Analysis of Evidence Photo 8				
646.	Friedman/Stephenson Analysis of Evidence Photo 9				
647.	Friedman/Stephenson Analysis of Evidence Photo 10				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
648.	Friedman/Stephenson Analysis of Evidence Photo 11				
649.	Friedman/Stephenson Analysis of Evidence Photo 12				
650.	Friedman/Stephenson Analysis of Evidence Photo 13				
651.	Friedman/Stephenson Analysis of Evidence Photo 14				
652.	Friedman/Stephenson Analysis of Evidence Photo 15				
653.	Friedman/Stephenson Analysis of Evidence Photo 16				
654.	Friedman/Stephenson Analysis of Evidence Photo 17				
655.	Friedman/Stephenson Analysis of Evidence Photo 18				
656.	Friedman/Stephenson Analysis of Evidence Photo 19				
657.	Friedman/Stephenson Analysis of Evidence Photo 20				
658.	Friedman/Stephenson Analysis of Evidence Photo 21				
659.	Friedman/Stephenson Analysis of Evidence Photo 22				
660.	Friedman/Stephenson Analysis of Evidence Photo 23				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
661.	Friedman/Stephenson Analysis of Evidence Photo 24				
662.	Friedman/Stephenson Analysis of Evidence Photo 25				
663.	Friedman/Stephenson Analysis of Evidence Photo 26				
664.	Friedman/Stephenson Analysis of Evidence Photo 27				
665.	Friedman/Stephenson Analysis of Evidence Photo 28				
666.	Friedman/Stephenson Analysis of Evidence Photo 29				
667.	Friedman/Stephenson Analysis of Evidence Photo 30				
668.	Friedman/Stephenson Analysis of Evidence Photo 31				
669.	Friedman/Stephenson Analysis of Evidence Photo 32				
670.	Friedman/Stephenson Analysis of Evidence Photo 33				
671.	Friedman/Stephenson Analysis of Evidence Photo 34				
672.	Friedman/Stephenson Analysis of Evidence Photo 35				
673.	Friedman/Stephenson Analysis of Evidence Photo 36				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
674.	Friedman/Stephenson Analysis of Evidence Photo 37				
675.	Friedman/Stephenson Analysis of Evidence Photo 38				
676.	Friedman/Stephenson Analysis of Evidence Photo 39				
677.	Friedman/Stephenson Analysis of Evidence Photo 40				
678.	Friedman/Stephenson Analysis of Evidence Photo 41				
679.	Friedman/Stephenson Analysis of Evidence Photo 42				
680.	Friedman/Stephenson Analysis of Evidence Photo 43				
681.	Friedman/Stephenson Analysis of Evidence Photo 44				
682.	Friedman/Stephenson Analysis of Evidence Photo 45				
683.	Friedman/Stephenson Analysis of Evidence Photo 46				
684.	Friedman/Stephenson Analysis of Evidence Photo 47				
685.	Friedman/Stephenson Analysis of Evidence Photo 48				
686.	Friedman/Stephenson Analysis of Evidence Photo 49				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
687.	Friedman/Stephenson Analysis of Evidence Photo 50				
688.	Friedman/Stephenson Analysis of Evidence Photo 51				
689.	Friedman/Stephenson Analysis of Evidence Photo 52				
690.	Friedman/Stephenson Analysis of Evidence Photo 53				
691.	Friedman/Stephenson Analysis of Evidence Photo 54				
692.	Friedman/Stephenson Analysis of Evidence Photo 55				
693.	Friedman/Stephenson Analysis of Evidence Photo 56				
694.	Friedman/Stephenson Analysis of Evidence Photo 57				
695.	Friedman/Stephenson Analysis of Evidence Photo 58				
696.	Friedman/Stephenson Analysis of Evidence Photo 59				
697.	Friedman/Stephenson Analysis of Evidence Photo 60				
698.	Friedman/Stephenson Analysis of Evidence Photo 61				
699.	Friedman/Stephenson Analysis of Evidence Photo 62				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
700.	Friedman/Stephenson Analysis of Evidence Photo 63				
701.	Friedman/Stephenson Analysis of Evidence Photo 64				
702.	Friedman/Stephenson Analysis of Evidence Photo 65				
703.	Friedman/Stephenson Analysis of Evidence Photo 66				
704.	Friedman/Stephenson Analysis of Evidence Photo 67				
705.	Friedman/Stephenson Analysis of Evidence Photo 68				
706.	Friedman/Stephenson Analysis of Evidence				
707.	Friedman/Stephenson Analysis of Evidence Photo 70				
708.	Friedman/Stephenson Analysis of Evidence Photo 71				
709.	Friedman/Stephenson Analysis of Evidence Photo 72				
710.	Friedman/Stephenson Analysis of Evidence Photo 73				
711.	Friedman/Stephenson Analysis of Evidence Photo 74				
712.	Friedman/Stephenson Analysis of Evidence Photo 75				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
713.	Friedman/Stephenson Analysis of Evidence Photo 76				
714.	Friedman/Stephenson Analysis of Evidence Photo 77				
715.	Friedman/Stephenson Analysis of Evidence Photo 78				
716.	Friedman/Stephenson Analysis of Evidence Photo 79				
717.	Friedman/Stephenson Analysis of Evidence Photo 80				
718.	Friedman/Stephenson Analysis of Evidence Photo 81				
719.	Friedman/Stephenson Analysis of Evidence Photo 82				
720.	Friedman/Stephenson Analysis of Evidence Photo 83				
721.	Friedman/Stephenson Analysis of Evidence Photo 84				
722.	Friedman/Stephenson Analysis of Evidence Photo 85				
723.	Friedman/Stephenson Analysis of Evidence Photo 86				
724.	Friedman/Stephenson Analysis of Evidence Photo 87				
725.	Friedman/Stephenson Analysis of Evidence Photo 88				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
726.	Friedman/Stephenson Analysis of Evidence Photo 89				
727.	Friedman/Stephenson Analysis of Evidence Photo 90				
728.	Friedman/Stephenson Analysis of Evidence Photo 91				
729.	Friedman/Stephenson Analysis of Evidence Photo 92				
730.	Friedman/Stephenson Analysis of Evidence Photo 93				
731.	Friedman/Stephenson Analysis of Evidence Photo 94				
732.	Friedman/Stephenson Analysis of Evidence Photo 95				
733.	Friedman/Stephenson Analysis of Evidence Photo 96				
734.	Friedman/Stephenson Analysis of Evidence Photo 97				
735.	Friedman/Stephenson Analysis of Evidence Photo 98				
736.	Friedman/Stephenson Analysis of Evidence Photo 99				
737.	Friedman/Stephenson Analysis of Evidence Photo 100				
738.	Cost information for Toyota fuel tank protectors if purchased from parts seller				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
739.	February 28, 2011 letter from the Insurance Institute for Highway Safety to National Highway Traffic Safety Administration: Petition for Rulemaking; 49 CFR Part 571 Federal Motor Vehicle Safety Standards; Rear Impact Guards; Rear Impact Protection				
740.	Insurance Institute for Highway Safety News Release: Underride guards on big rigs often fail in crashes; Institute petitions government for new standard				
741.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 46, No. 2, March 1, 2011: Underride Crashes				
742.	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 47, No. 5, July 3, 2012: Special Issue: Crash Avoidance				
743.	Insurance Institute for Highway Safety Bulletin Vol. 29, No. 5, April 2012: Volvo collision avoidance features: initial results				
744.	Expert report of Dr. Joseph Burton				
745.	Curriculum Vitae of Dr. Joseph Burton				
746.	Collection of Dr. Burton's Vehicle Inspection Photographs				
747.	Dr. Burton Rear Impact Case list				
748.	Dr. Burton Underride Case list				
749.	Dr. Burton Fuel-fed Fires Cases list				
750.	Dr. Burton Lateral Impact Cases list				
751.	Dr. Burton Rear Impact Bibliography				
752.	Dr. Burton Fire / CO Bibliography				

PLF. NO.	DESCRIPTION	OFFR	OBJ	DATE	
				ADMIT	N/ADM
753.	Dr. Burton Side Impact Bibliography				
754.	Dr. Burton Underride Bibliography				
755.	Dr. Burton Head Injury Bibliography				
756.	Dr. Burton Human Tolerance Bibliography				
757.	Dr. Burton Pain & Suffering Bibliography				
758.	Dr. Burton Diagnosis of Seat Belt Usage Bibliography				
759.	Dr. Burton Seat Belt Bibliography				
760.	Dr. Burton Forensic Textbook Bibliography				
761.	Papers authored by Dr. Burton				
762.	Timeline of critical dates				

Plaintiffs further reserve the right to use any exhibits identified by Defendants in their exhibit lists, as well as rebuttal exhibits whose use may not be known, or reasonably anticipated, at the time of this submission.

Respectfully Submitted,

/s/ Aubrey "Nick" Pittman
 AUBREY "NICK" PITTMAN
 State Bar No. 16049750

THE PITTMAN LAW FIRM, P.C.
 100 Crescent Court, Suite 700
 Dallas, Texas 75201-2112
 214-459-3454
 214-853-5912 – fax
 pittman@thepittmanlawfirm.com

/s/ Daryl K. Washington
 DARYL K. WASHINGTON
 State Bar No. 24013714

**LAW OFFICES OF DARYL K. WASHINGTON
 P.C.**
 325 N. St. Paul St., Suite 1975
 Dallas, Texas 75201
 214-880-4883
 469-718-0380 - fax
 dwashington@dwashlawfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2014, the foregoing document was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Aubrey “Nick” Pittman
AUBREY “NICK” PITTMAN